FACT SHEET

as required by LAC 33:IX.2411, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0038059; AI 4857; PER20060001** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:
Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

I. **THE APPLICANT IS:** City of Westwego
Westwego Wastewater Treatment Plant
419 Avenue A
Westwego, LA 70094

II. **PREPARED BY:** Angela Marse

DATE PREPARED: December 19, 2006

III. **PERMIT ACTION:** LPDES permit LA0038059, AI4857

LPDES application received: January 27, 2006

LPDES permit issued: February 1, 2001
LPDES permit expired: January 31, 2001

IV. **FACILITY INFORMATION:**

A. The application is for the discharge of treated sanitary wastewater from a publicly owned treatment works serving the City of Westwego.

B. The permit application does indicate the receipt of industrial wastewater.

C. The facility is located at 100 Vic-A-Pitre Drive (at its intersection with Laroussini Street) in Westwego, Jefferson Parish.

D. The treatment facility consists of a bar screen and grit remover followed by primary and secondary clarification. Sludge is transferred to drying beds where sludge is dried and transported to a landfill for disposal. Disinfection is by chlorination.

E. Outfall 001

Current Discharge Location: Latitude 29°53'50"North
Longitude 90°09'10"West
(located in the northeast section of the facility)

Proposed Discharge Location: Latitude 29°54'42"North
Longitude 90°08'09"West
(Mississippi River mile 101)

Description: treated sanitary wastewater

Design Capacity: 3.0 MGD

Type of Flow Measurement which the facility is currently using:

Combination Totalizing Meter / Continuous Recorder

V. **RECEIVING WATERS:**

Current discharge route:

The current discharge is into the Vic - A- Pitre Canal, thence into Bayou Segnette in segment 020701of the Barataria Basin. This segment is listed on the 303(d) list of impaired waterbodies.

The **critical low flow** (7Q10) of the Vic - A- Pitre Canal, thence into Bayou Segnette is 0.1 cfs.

The **hardness value** is 638.65mg/l and the **fifteenth percentile value for TSS** is 5.49mg/l.

The designated uses and degree of support for Segment 020701 of the Barataria Basin are as indicated in the table below[1/]:

Overall Degree of Support for Segment	Degree of Support of Each Use						
Partially Supported	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
	Not Supported	Supported	Not Supported	N/A	N/A	N/A	N/A

[1/] The designated uses and degree of support for Segment 020701 of the Barataria Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

Section 303 (d) of the Clean Water Act as amended by the Water Quality Act of 1987, and EPA's regulations at 40 CFR 130 require that each state identify those waters within its boundaries not meeting water quality standards. The Clean Water Act further requires states to implement plans to address impairments. LDEQ is developing Total Maximum Daily Loadings Studies (TMDLs) to address impaired waterbodies. Segment 020701, Bayou Segnette – origin to Bayou Villars is on the 2004 Integrated 303(d) List of Impaired Waterbodies. Impairments can be attributed to low dissolved oxygen/organic enrichment, pathogen indicators, phosphorus and nitrate/nitrites. TMDLs have been completed for this waterbody. However, the permittee is currently constructing a new discharge route to the Mississippi River Segment 070301. Construction completion is anticipated by April, 2007. Therefore, effluent limitations in the proposed permit are based on the relocation of the outfall and not TMDLs for Segment 020701 of the Barataria Basin. A reopener clause is included in the permit to impose more stringent discharge limitations and/or additional restrictions as a result of any future TMDLs in Segment 070301 of the Mississippi River Basin.

Proposed discharge route:

The proposed discharge is by pipe into the Mississippi River in segment 070301 of the Mississippi River Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

The **critical low flow** (7Q10) of the Mississippi River is 141,955cfs.

The **hardness value** is 153.03mg/l and the **fifteenth percentile value for TSS** is 30mg/l.

The designated uses and degree of support for Segment 070301of the Mississippi River Basin are as indicated in the table below[1/]:

Overall Degree of Support for Segment	Degree of Support of Each Use						
Fully Supported	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
	Fully Supported	Fully Supported	Fully Supported	N/A	Fully Supported	N/A	N/A

[1/] The designated uses and degree of support for Segment 070301 of the Mississippi River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

Section 303 (d) of the Clean Water Act as amended by the Water Quality Act of 1987, and EPA's regulations at 40 CFR 130 require that each state identify those waters within its boundaries not meeting water quality standards and develop plans for those waterbodies to meet water quality standards. Segment 070301, the Mississippi River from Monte Sano Bayou to Head of Pass, Mississippi River Basin is not on the 2004 303(d) List of Impaired Waterbodies. No Total Daily Maximum Load (TMDL) Studies will be performed for this Segment.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, is listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish & Wildlife Service (FWS) as habitat for the *Pallid Sturgeon*, which is listed as an endangered species. LDEQ, as instructed by the FWLS in a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ), has sent this draft permit to the FWLS for review and consultation.

The receiving waterbody, Subsegment 020701 of the Barataria Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between LDEQ and the FWS, no further informal (Section7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered species or candidate species or their critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the fact sheet. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:
Local newspaper of general circulation
Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Mrs. Angela Marse
Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

Interim I Effluent Limits: discharges to the Vic-a-Pitre Canal

OUTFALL 001

Currently, the City of Westwego Wastewater Treatment Facility discharges to the Vic-a-Pitre Canal located in the Barataria Basin. The City is in the process of constructing a new outfall location to the Mississippi River. A compliance schedule has been placed in the permit to allow time for completion of construction. A compliance schedule with a completion date of March 31, 2007 was included in WE-CN-0618B. Conversations with consultants for the City indicated the bid process beginning around June, 2006. (This is several months behind the schedule in the Order.) To ensure protection of the current receiving stream since effluent limits to the Mississippi River will be less stringent, the compliance schedule proposed in the permit is longer than that in the Order. The following effluent limits shall apply for the interim period. With the exception of benzidine, they are based on the previous permit. (TMDLs for the Barataria Basin were not considered in the development of effluent limits since the new outfall location is in the Mississippi River Basin.)

Dibromochloromethane and mercury will remain in the permit. DMR results for dibromochloromethane were not reported in pounds per day. They were reported in ug/l. When converted to pounds per day, several results indicated concentrations above the water quality-based limit. The City of Westwego is specifically listed in the EPA TMDL for Mercury in Coastal Bays and Gulf Waters with the 0.0007lb/day daily average and 0.0017lb/day daily maximum. In addition, development of a Mercury Minimization Plan will be required by the permittee if completion of construction of the new outfall is not complete within one year from the effective date of the permit. See XII. Additional Information.

Effluent analysis submitted July 25, 2006 indicated the presence of benzidine in the City's effluent.

During the draft comment period, the permittee may submit the results of three (3) or more additional effluent analyses to either refute or substantiate the presence of this pollutant. Prior to finalization of this permit, the additional analyses will be evaluated by this Office to determine if the pollutant is potentially in the effluent and if it potentially exceeds the State's water quality standards.

Interim I effluent limits shall become effective on the effective date of the permit and expire upon completion of construction but no later than two years from the effective date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
$CBOD_5$	250	10 mg/l	15 mg/l	Previous permit effluent limitations based on the Westwego Municipal Wastewater Treatment Facility Wasteload Allocation. (November, 1994)
TSS	375	15 mg/l	23 mg/l	Since there is no numeric water quality criterion for TSS, and in accordance with the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility.
Ammonia-Nitrogen	75	3 mg/l	6 mg/l	Previous permit effluent limitations based on the Westwego Municipal Wastewater Treatment Facility Wasteload Allocation. (November, 1994)
Dissolved Oxygen	N/A	5 mg/l	N/A	Previous permit effluent limitations based on the Westwego Municipal Wastewater Treatment Facility Wasteload Allocation. (November, 1994)

**This Dissolved Oxygen limit is the lowest allowable average of daily discharges over a calendar month. When monitoring is conducted, the Dissolved Oxygen shall be analyzed immediately, as per 40 CFR 136.3.

Priority Pollutants

Effluent Characteristic	Monthly Avg. (lbs./day)	Daily Max. (lbs/day)	Basis
Dibromochloro-methane	0.129	0.309	Previous permit limit. The effluent limitations are based on a Water Quality Screen Spreadsheet (Appendix B-1) utilizing the Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards, 2001.
Mercury	0.0007	0.0017	Previous permit limit. The effluent limitations are based on a Water Quality Screen Spreadsheet (Appendix B-1) utilizing the Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards, 2001.
Benzidine	Report	Report	A Water Quality Screen indicated the need for a Water Quality Based Limit. For monitoring and data gathering purposes, report is proposed in the interim period.

Other Effluent Limitations:

1) **Fecal Coliform**

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) **pH**

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C, the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.
The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time. (Limits as established through BPJ considering BCT for similar waste streams in accordance with LAC 33:IX.5905.C.)

3) **Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

4) Total Residual Chlorine

If chlorination is used to achieve the limitations on Fecal Coliform Bacteria, the effluent shall contain NO MEASURABLE Total Residual Chlorine (TRC) after disinfection and prior to disposal. Given the current constraints pertaining to chlorine analytical methods, NO MEASURABLE will be defined as less than 0.1 mg/l of chlorine. The TRC shall be monitored 2/week by grab sample.

Toxicity Characteristics

Based on information contained in the permit application, LDEQ has determined there may be pollutants present in the effluent which may have the potential to cause toxic conditions in the receiving stream in violation of Section 101(a)(3) of the Clean Water Act. The State has established a narrative criteria which, in part, states that 'No substances shall be present in the waters of the State or the sediments underlying said waters in quantities alone or in combination will be toxic to human, plant, or animal life ...' (LAC 33:IX.1113.B.5).

Whole effluent biomonitoring is the most direct measure of potential toxicity which incorporates the effects of synergism of the effluent components and receiving stream water quality characteristics. Biomonitoring of the effluent is, therefore, required as a condition of this permit to assess potential toxicity. LAC 33:IX.1121.B.3. provides for the use of biomonitoring to monitor the effluent for protection of State waters. The biomonitoring procedures stipulated as a condition of this permit are as follows:

The permittee shall submit the results of any biomonitoring testings performed in accordance with the LPDES Permit No LA0038059 **Section E** for the organisms indicated below.

TOXICITY TESTS	FREQUENCY
Chronic static renewal 7-day survival & reproduction test using *Ceriodaphnia dubia*	1/quarter
Chronic static renewal 7-day survival & growth test using *Pimephales promelas*	1/quarter

Dilution Series - The permit requires five (5) dilutions in addition to the control (0% effluent) to be used in the toxicity tests. These additional concentrations shall be 31%, 41%, 55 %, 73%, and 98%. The low-flow effluent concentration (critical low-flow dilution) is defined as 98% effluent. The critical dilution is calculated in Appendix B-1 of this fact sheet. Results of all dilutions shall be documented in a full report according to the test method publication mentioned in the **Biomonitoring Section E** under Whole Effluent Toxicity. This full report shall be submitted to the Office of Environmental Compliance as contained in the Reporting Paragraph located in the **Biomonitoring Section E** of the permit.

Interim II Effluent Limits: discharges to the Mississippi River

OUTFALL 001

The City of Westwego is changing the discharge route from their wastewater treatment plant. When construction is finished, effluent will be piped directly to the Mississippi River. Because of flow and dispersion, the Mississippi River system will not be significantly impacted by a secondary discharge. Based on the Statewide Sanitary Effluent Limitations Policy sewer treatment plants discharging into the Mississippi River will be assigned secondary treatment limits.

Mercury limits placed in the permit as a result of EPA's mercury TMDL for Coastal Bays and Gulf Waters have been removed from the requirements for discharges to the Mississippi River. (The Mississippi River was modeled into the TMDL as a single point source discharge.)

A new water quality screen was conducted utilizing stream data for the Mississippi River. Effluent limits for dibromochoromethane are not required for discharges to the Mississippi River and have been removed from the effluent limits.

The water quality screen did indicate an effluent limit is still necessary to protect water quality standards for benzidine. As indicated in the Final Effluents I discussion, the period prior to discharging to the Mississippi River will considered an interim reporting period for benzidine. Upon discharging to the Mississippi River, the permittee will be required to meet effluent limit in the table below. During the draft comment period, the permittee may submit the results of three (3) or more additional effluent analyses to either refute or substantiate the presence of this pollutant. Prior to finalization of this permit, the additional analyses will be evaluated by this Office to determine if the pollutant is potentially in the effluent and if it potentially exceeds the State's water quality standards.

Interim II effluent limits shall become effective upon completion of construction but not later than two years from the effective date of the permit and expire three years from the effective date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
BOD_5	750	30 mg/l	45 mg/l	Statewide Sanitary Effluent Limitations Policy allows for secondary treatment from systems discharging to the Mississippi River.
TSS	750	30 mg/l	45 mg/l	Statewide Sanitary Effluent Limitations Policy allows for secondary treatment from systems discharging to the Mississippi River.

Priority Pollutants

Effluent Characteristic	Monthly Avg. (lbs./day)	Daily Max. (lbs/day)	Basis
Benzidine	Report	Report	A Water Quality Screen indicated the need for a Water Quality Based Limit. For monitoring and data gathering purposes, report is proposed in the interim period.

Other Effluent Limitations:

1) **Fecal Coliform**

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) **pH**

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C, the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.
The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time. (Limits as established through BPJ considering BCT for similar waste streams in accordance with LAC 33:IX.5905.C.)

3) **Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

Toxicity Characteristics

Based on information contained in the permit application, LDEQ has determined there may be pollutants present in the effluent which may have the potential to cause toxic conditions in the receiving stream in violation of Section 101(a)(3) of the Clean Water Act. The State has established a narrative criteria which, in part, states that 'No substances shall be present in the waters of the State or the sediments underlying said waters in quantities alone or in combination will be toxic to human, plant, or animal life ...' (LAC 33:IX.1113.B.5).

Whole effluent biomonitoring is the most direct measure of potential toxicity which incorporates the effects of synergism of the effluent components and receiving stream water quality characteristics. Biomonitoring of the effluent is, therefore, required as a condition of this permit to assess potential toxicity. LAC 33:IX.1121.B.3. provides for the use of biomonitoring to monitor the effluent for protection of State waters. The biomonitoring procedures stipulated as a condition of this permit are as follows:

The permittee shall submit the results of any biomonitoring testings performed in accordance with the LPDES Permit No LA0038059 **Section F** for the organisms indicated below.

TOXICITY TESTS	FREQUENCY
Acute state renewal 48-hour acute test using *Daphia pulex* (EPA-821-R-02-012)	1/year
Acute state renewal 48-hour acute test using *fathead minnow (Pimephales promelas)* EPA-821-R-02-012)	1/year

Dilution Series - The permit requires five (5) dilutions in addition to the control (0% effluent) to be used in the toxicity tests. These additional concentrations shall be 0.04%, 0.06%, 0.07 %, 0.10%, and 0.13%. The low-flow effluent concentration (critical low-flow dilution) is defined as 0.10% effluent. The critical dilution is calculated in Appendix B-1 of this fact sheet. Results of all dilutions shall be documented in a full report according to the test method publication mentioned in the **Biomonitoring Section F** under Whole Effluent Toxicity. This full report shall be submitted to the Office of Environmental Compliance as contained in the Reporting Paragraph located in the **Biomonitoring Section F**of the permit.

TOXIC SUBSTANCES

Drinking water supply is a designated use of Subsegment 070301 of the Mississippi River Basin. West Jefferson drinking water intake is located downstream of the POTW discharge. For this reason, the permittee shall analyze effluent for the presence of the following toxic substances in accordance with the monitoring requirements listed in Part I of the proposed permit.

1. A report containing the results of the laboratory analysis shall be submitted to this Office within 20 days of completion of the analysis. The first analysis shall be performed within six months following the effective date of the permit, and every six months thereafter.
2. The LDEQ Regional Office and all drinking water intakes located less than 5 miles downstream of the discharge shall be notified upon detection of any toxic substances above the MQL.

3. Reports should be submitted to the following address:

   Department of Environmental Quality
   Office of Environmental Compliance
   Post Office Box 4312
   Baton Rouge, La 70821-4312

TOXIC SUBSTANCES

TOXIC SUBSTANCES (CAS No.)	Required MQL (µg/l)	EPA Test Method
VOLATILE ORGANIC CHEMICALS		
Acrolein [2-Propenal] (107-02-8)	50	624
Acrylonitrile [2-Propenenitrile] (107-13-1)	50	624
Benzene (71-43-2)	10	624
Bromodichloromethane [Dichlorobromomethane] (75-27-4)	10	624
Bromoform [Tribromomethane] (75-25-2)	10	624
Carbon Tetrachloride (56-23-5)	10	624
Chlorobenzene [Tetrachloromethane] (108-90-7)	10	624
Chloroform [Trichloromethane] (67-66-3)	10	624
Chloromethane [Methyl chloride] (74-87-3)	50	624
1,1-Dichloroethane (75-34-3)	10	624
1,2-Dichloroethane (107-06-2)	10	624
1,1-Dichloroethylene [1,1-Dichloroethene] (75-35-4)	10	624
Dichloromethane [Methylene chloride] (75-09-2)	20	624
cis-1,3-Dichloropropene (10061-01-5)	10	624
trans-1,3-Dichloropropene (10061-02-6)	10	624
Ethylbenzene (100-41-4)	10	624
para-Dichlorobenzene* (106-46-7)[1]	REPORT	---
1,1,2,2-Tetrachloroethane (79-34-5)	10	624
Tetrachloroethylene [Tetrachloroethene] (127-18-4)	10	624
Toluene [Methyl benzene] (108-88-3)	10	624
1,1,1-Trichloroethane (71-55-6)	10	624
1,1,2-Trichloroethane (79-00-5)	10	624
Trichloroethylene [Trichloroethene] (79-01-6)	10	624
Vinyl chloride [Chloroethene] (75-01-4)	10	624

TOXIC SUBSTANCES (CAS No.)	Required MQL (µg/l)	EPA Test Method
ACID EXTRACTABLE ORGANIC CHEMICALS		
2-Chlorophenol [o-Chlorophenol] (95-57-8)	10	625[2]
3-Chlorophenol [m-Chlorophenol] (108-43-0)	10	625[2]
4-Chlorophenol [p-Chlorophenol] (106-48-9)	10	625[2]
2,4-Dichlorophenol (120-83-2)	10	625[2]
2,3-Dichlorophenol (576-24-9)	10	625[2]
2,5-Dichlorophenol (583-78-8)	10	625[2]
2,6-Dichlorophenol (87-65-0)	10	625[2]
3,4-Dichlorophenol (95-77-2)	10	625[2]
2,4-Dinitrophenol (51-28-5)	50	625[2]
Pentachlorophenol [PCP] (87-86-5)	50	625[2]
Phenol (108-95-2)	10	625[2]
2,4,6-Trichlorophenol (88-06-2)	10	625[2]
BASE/NEUTRAL EXTRACTABLE ORGANIC CHEMICALS		
Anthracene (120-12-7)	10	625[2]
Benzidine (92-87-5)	50	625[2]
Bis[2-Chloroethyl]ether (111-44-4)	10	625[2]
Bis[2-Chloro-1-methylethyl] ether (108-60-1)	10	625[2]
Bis[2-ethylhexyl] phthalate [diethylhexylphthalate] (117-81-7)	10	625[2]
Di-n-butyl phthalate (84-74-2)	10	625[2]
1,3-Dichlorobenzene [m-Dichlorobenzene] (541-73-1)	10	625[2]
1,2-Dichlorobenzene [o-Dichlorobenzene] (95-50-1)	10	625[2]
1,4-Dichlorobenzene [p-Dichlorobenzene] (106-46-7)	10	625[2]
3,3-Dichlorobenzidine (91-94-1)	50	625[2]
Diethyl phthalate [Diethyl ester] (84-66-2)	10	625[2]
Dimethyl phthalate [Dimethyl ester] (131-11-3)	10	625[2]

TOXIC SUBSTANCES (CAS No.)	Required MQL (µg/l)	EPA Test Method
2,4-Dinitrotoluene [2,4-DNT] (121-14-2)	10	625[2]
1,2-Diphenylhydrazine (122-66-7)	20	625[2]
Fluoranthene (206-44-0)	10	625[2]
Hexachlorobenzene (118-74-1)	10	625[2]
Hexachlorobutadiene [1,3-Hexachlorobutadiene] (87-68-3)	10	625[2]
Hexachlorocyclopentadiene (77-47-4)	10	625[2]
Hexachloroethane (67-72-1)	20	625[2]
Isophorone (78-59-1)	10	625[2]
Nitrobenzene [NB] (98-95-3)	10	625[2]
n-Nitrosodimethylamine (62-75-9)	50	625[2]
n-Nitrosodiphenylamine (86-30-6)	20	625[2]
PESTICIDES & PCB'S		
Aldrin (309-00-2)	0.05	608
Polychlorinated biphenyls [PCB's] (1336-36-3)	1.0	608
Gamma-BHC [Lindane, Hexachlorocyclohexane] (58-89-9)	0.05	608
Chlordane (57-74-9)	0.2	608
4,4"DDD [DDD] (72-54-8)	0.1	608
4,4"DDE [DDE] (72-55-9)	0.1	608
4,4"DDT [DDT] (50-29-3)	0.1	608
Dieldrin (60-57-1)	0.1	608
Endosulfan I [alpha] (959-98-8)	0.1	608
Endosulfan II [beta] (33213-65-9)	0.1	608
Endrin (72-20-8)	0.1	608
Heptachlor (76-44-8)	0.05	608
Methoxychlor [4,4-Methoxychlor] (72-43-5)[1]	REPORT	---
2,3,7,8-Tetrachlorodibenzo-p-dioxin [TCDD] (1764-01-6)	0.00001	625[2]

TOXIC SUBSTANCES (CAS No.)	Required MQL[2] (µg/l)	EPA Test Method
Toxaphene (8001-35-2)	5.0	608
2,4-Dichlorophenoxyacetic acid (2,4-D) (94-75-7)	10	509B
2-(2,4,5-Trichlorophenoxy)proprionic acid (93-72-1)	4	509B
METALS		
Antimony (7440-36-0)	60	200.7
Arsenic (7440-38-2)	10	206.2
Barium (7440-39-3)[1]	REPORT	---
Beryllium (7440-41-7)	5	200.7
Cadmium (7440-43-9)	1	213.2
Chromium III (16065-83-1)[3]	10	200.7
Chromium VI (18540-29-9)[3]	10	200.7
Copper (7440-50-8)	10	220.2
Lead (7439-92-1)	5	239.2
Fluoride (16984-48-8)[1]	REPORT	---
Mercury (7439-97-6)	0.2	245.1
Nickel (7440-02-0)	40	200.7
Nitrate [as N] (14797-55-8)[1]	REPORT	---
Selenium (7782-49-2)	5	270.2
Silver (7440-22-4)	2	272.2
Thallium (7440-28-0)	10	279.2
Zinc (7440-66-6)	20	200.7
MISCELLANEOUS		
Cyanide (57-12-5)	20	335.2
Total Phenols (108-95-2)	5	420.1

[1] In addition to reporting the effluent lab result for this pollutant, also report the Test Method used.

[2] Method 625 is a nonquantitative screen used to ascertain a positive or negative result. With proper QA/QC techniques, a positive result can be expected at a level above 1 ppm. If this test yields a

positive response, then Method 613 would be appropriate to establish the quantitative value. Method 613 requires use of the dioxin standard which is dangerous and should not be used unnecessarily.

3 Report the sum of Chromium III and Chromium VI as Total Chromium. Total Chromium has been removed from State Water Quality Standards and replaced with criteria for Chromium III and Chromium VI.

Final Effluent Limits

OUTFALL 001

Final effluent limits are the same as those under Interim II with the exception of benzidine. The reporting period for benzidine has been replaced with a water quality based limit.

Final limits shall become effective three years from the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
BOD_5	750	30 mg/l	45 mg/l	Statewide Sanitary Effluent Limitations Policy allows for secondary treatment from systems discharging to the Mississippi River.
TSS	750	30 mg/l	45 mg/l	Statewide Sanitary Effluent Limitations Policy allows for secondary treatment from systems discharging to the Mississippi River.

Priority Pollutants

Effluent Characteristic	Monthly Avg. (lbs./day)	Daily Max. (lbs/day)	Basis
Benzidine	0.06	0.145	The effluent limitations are based on a Water Quality Screen Spreadsheet (Appendix B-1) utilizing the Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards, 2001.

Other Effluent Limitations:

1) Fecal Coliform

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of

200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C, the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.
The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time. (Limits as established through BPJ considering BCT for similar waste streams in accordance with LAC 33:IX.5905.C.)

3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

Toxicity Characteristics

Based on information contained in the permit application, LDEQ has determined there may be pollutants present in the effluent which may have the potential to cause toxic conditions in the receiving stream in violation of Section 101(a)(3) of the Clean Water Act. The State has established a narrative criteria which, in part, states that 'No substances shall be present in the waters of the State or the sediments underlying said waters in quantities alone or in combination will be toxic to human, plant, or animal life ...' (LAC 33:IX.1113.B.5).

Whole effluent biomonitoring is the most direct measure of potential toxicity which incorporates the effects of synergism of the effluent components and receiving stream water quality characteristics. Biomonitoring of the effluent is, therefore, required as a condition of this permit to assess potential toxicity. LAC 33:IX.1121.B.3. provides for the use of biomonitoring to monitor the effluent for protection of State waters. The biomonitoring procedures stipulated as a condition of this permit are as follows:

The permittee shall submit the results of any biomonitoring testings performed in accordance with the LPDES Permit No LA0038059 **Section F** for the organisms indicated below.

TOXICITY TESTS	FREQUENCY
Acute state renewal 48-hour acute test using *Daphia pulex* (EPA-821-R-02-012)	1/year
Acute state renewal 48-hour acute test using *fathead minnow (Pimephales promelas)* EPA-821-R-02-012)	1/year

Dilution Series - The permit requires five (5) dilutions in addition to the control (0% effluent) to be used in the toxicity tests. These additional concentrations shall be 0.04%, 0.06%, 0.07 %, 0.10%, and 0.13%. The low-flow effluent concentration (critical low-flow dilution) is defined as 0.10% effluent.

The critical dilution is calculated in Appendix B-1 of this fact sheet. Results of all dilutions shall be documented in a full report according to the test method publication mentioned in the **Biomonitoring Section F** under Whole Effluent Toxicity. This full report shall be submitted to the Office of Environmental Compliance as contained in the Reporting Paragraph located in the **Biomonitoring Section F** of the permit.

TOXIC SUBSTANCES

Drinking water supply is a designated use of Subsegment 070301 of the Mississippi River Basin. West Jefferson drinking water intake is located downstream of the POTW discharge. For this reason, the permittee shall analyze effluent for the presence of the following toxic substances in accordance with the monitoring requirements listed in Part I of the proposed permit.

1. A report containing the results of the laboratory analysis shall be submitted to this Office within 20 days of completion of the analysis. The first analysis shall be performed within six months following the effective date of the permit, and every six months thereafter.
2. The LDEQ Regional Office and all drinking water intakes located less than 5 miles downstream of the discharge shall be notified upon detection of any toxic substances above the MQL.

3. Reports should be submitted to the following address:

   Department of Environmental Quality
   Office of Environmental Compliance
   Post Office Box 4312
   Baton Rouge, La 70821-4312

TOXIC SUBSTANCES

TOXIC SUBSTANCES (CAS No.)	Required MQL (µg/l)	EPA Test Method
VOLATILE ORGANIC CHEMICALS		
Acrolein [2-Propenal] (107-02-8)	50	624
Acrylonitrile [2-Propenenitrile] (107-13-1)	50	624
Benzene (71-43-2)	10	624
Bromodichloromethane [Dichlorobromomethane] (75-27-4)	10	624
Bromoform [Tribromomethane] (75-25-2)	10	624
Carbon Tetrachloride (56-23-5)	10	624
Chlorobenzene [Tetrachloromethane] (108-90-7)	10	624
Chloroform [Trichloromethane] (67-66-3)	10	624
Chloromethane [Methyl chloride] (74-87-3)	50	624

TOXIC SUBSTANCES (CAS No.)	Required MQL (ug/l)	EPA Test Method
1,1-Dichloroethane (75-34-3)	10	624
1,2-Dichloroethane (107-06-2)	10	624
1,1-Dichloroethylene [1,1-Dichloroethene] (75-35-4)	10	624
Dichloromethane [Methylene chloride] (75-09-2)	20	624
cis-1,3-Dichloropropene (10061-01-5)	10	624
trans-1,3-Dichloropropene (10061-02-6)	10	624
Ethylbenzene (100-41-4)	10	624
para-Dichlorobenzene* (106-46-7)[1]	REPORT	---
1,1,2,2-Tetrachloroethane (79-34-5)	10	624
Tetrachloroethylene [Tetrachloroethene] (127-18-4)	10	624
Toluene [Methyl benzene] (108-88-3)	10	624
1,1,1-Trichloroethane (71-55-6)	10	624
1,1,2-Trichloroethane (79-00-5)	10	624
Trichloroethylene [Trichloroethene] (79-01-6)	10	624
Vinyl chloride [Chloroethene] (75-01-4)	10	624
ACID EXTRACTABLE ORGANIC CHEMICALS		
2-Chlorophenol [o-Chlorophenol] (95-57-8)	10	625[2]
3-Chlorophenol [m-Chlorophenol] (108-43-0)	10	625[2]
4-Chlorophenol [p-Chlorophenol] (106-48-9)	10	625[2]
2,4-Dichlorophenol (120-83-2)	10	625[2]
2,3-Dichlorophenol (576-24-9)	10	625[2]
2,5-Dichlorophenol (583-78-8)	10	625[2]
2,6-Dichlorophenol (87-65-0)	10	625[2]
3,4-Dichlorophenol (95-77-2)	10	625[2]
2,4-Dinitrophenol (51-28-5)	50	625[2]
Pentachlorophenol [PCP] (87-86-5)	50	625[2]

TOXIC SUBSTANCES (CAS No.)	Required MQL (µg/l)	EPA Test Method
Phenol (108-95-2)	10	625[2]
2,4,6-Trichlorophenol (88-06-2)	10	625[2]
BASE/NEUTRAL EXTRACTABLE ORGANIC CHEMICALS		
Anthracene (120-12-7)	10	625[2]
Benzidine (92-87-5)	50	625[2]
Bis[2-Chloroethyl]ether (111-44-4)	10	625[2]
Bis[2-Chloro-1-methylethyl] ether (108-60-1)	10	625[2]
Bis[2-ethylhexyl] phthalate [diethylhexylphthalate] (117-81-7)	10	625[2]
Di-n-butyl phthalate (84-74-2)	10	625[2]
1,3-Dichlorobenzene [m-Dichlorobenzene] (541-73-1)	10	625[2]
1,2-Dichlorobenzene [o-Dichlorobenzene] (95-50-1)	10	625[2]
1,4-Dichlorobenzene [p-Dichlorobenzene] (106-46-7)	10	625[2]
3,3-Dichlorobenzidine (91-94-1)	50	625[2]
Diethyl phthalate [Diethyl ester] (84-66-2)	10	625[2]
Dimethyl phthalate [Dimethyl ester] (131-11-3)	10	625[2]
2,4-Dinitrotoluene [2,4-DNT] (121-14-2)	10	625[2]
1,2-Diphenylhydrazine (122-66-7)	20	625[2]
Fluoranthene (206-44-0)	10	625[2]
Hexachlorobenzene (118-74-1)	10	625[2]
Hexachlorobutadiene [1,3-Hexachlorobutadiene] (87-68-3)	10	625[2]
Hexachlorocyclopentadiene (77-47-4)	10	625[2]
Hexachloroethane (67-72-1)	20	625[2]
Isophorone (78-59-1)	10	625[2]
Nitrobenzene [NB] (98-95-3)	10	625[2]
n-Nitrosodimethylamine (62-75-9)	50	625[2]
n-Nitrosodiphenylamine (86-30-6)	20	625[2]

TOXIC SUBSTANCES (CAS No.)	Required MQL (ug/l)	EPA Test Method
PESTICIDES & PCB'S		
Aldrin (309-00-2)	0.05	608
Polychlorinated biphenyls [PCB's] (1336-36-3)	1.0	608
Gamma-BHC [Lindane, Hexachlorocyclohexane] (58-89-9)	0.05	608
Chlordane (57-74-9)	0.2	608
4,4"DDD [DDD] (72-54-8)	0.1	608
4,4"DDE [DDE] (72-55-9)	0.1	608
4,4"DDT [DDT] (50-29-3)	0.1	608
Dieldrin (60-57-1)	0.1	608
Endosulfan I [alpha] (959-98-8)	0.1	608
Endosulfan II [beta] (33213-65-9)	0.1	608
Endrin (72-20-8)	0.1	608
Heptachlor (76-44-8)	0.05	608
Methoxychlor [4,4-Methoxychlor] (72-43-5)[1]	REPORT	---
2,3,7,8-Tetrachlorodibenzo-p-dioxin [TCDD] (1764-01-6)	0.00001	625[2]
Toxaphene (8001-35-2)	5.0	608
2,4-Dichlorophenoxyacetic acid (2,4-D) (94-75-7)	10	509B
2-(2,4,5-Trichlorophenoxy)proprionic acid (93-72-1)	4	509B
METALS		
Antimony (7440-36-0)	60	200.7
Arsenic (7440-38-2)	10	206.2
Barium (7440-39-3)[1]	REPORT	---
Beryllium (7440-41-7)	5	200.7
Cadmium (7440-43-9)	1	213.2
Chromium III (16065-83-1)[3]	10	200.7
Chromium VI (18540-29-9)[3]	10	200.7

TOXIC SUBSTANCES (CAS No.)	Required MQL (µg/l)	EPA Test Method
Copper (7440-50-8)	10	220.2
Lead (7439-92-1)	5	239.2
Fluoride (16984-48-8)[1]	REPORT	---
Mercury (7439-97-6)	0.2	245.1
Nickel (7440-02-0)	40	200.7
Nitrate [as N] (14797-55-8)[1]	REPORT	---
Selenium (7782-49-2)	5	270.2
Silver (7440-22-4)	2	272.2
Thallium (7440-28-0)	10	279.2
Zinc (7440-66-6)	20	200.7
MISCELLANEOUS		
Cyanide (57-12-5)	20	335.2
Total Phenols (108-95-2)	5	420.1

[1] In addition to reporting the effluent lab result for this pollutant, also report the Test Method used.

[2] Method 625 is a nonquantitative screen used to ascertain a positive or negative result. With proper QA/QC techniques, a positive result can be expected at a level above 1 ppm. If this test yields a positive response, then Method 613 would be appropriate to establish the quantitative value. Method 613 requires use of the dioxin standard which is dangerous and should not be used unnecessarily.

[3] Report the sum of Chromium III and Chromium VI as Total Chromium. Total Chromium has been removed from State Water Quality Standards and replaced with criteria for Chromium III and Chromium VI.

X. PREVIOUS PERMITS:

LPDES Permit No. LA0038059: Issued: February 1, 2001
Expired: January 31, 2006

Interim Effluent Limitations (effective through January 31, 2004)

Effluent Characteristic	Discharge Limitations		Monitoring Requirements	
	Daily Avg.	Daily Max.	Measurement Frequency	Sample Type
Flow	Report	Report	Continuous	Recorder
$CBOD_5$	10 mg/l	15 mg/l	2/week	6-hr. composite
TSS	15 mg/l	23 mg/l	2/week	6-hr. composite
Ammonia-Nitrogen	3 mg/l	6 mg/l	2/week	6-hr. composite
Mercury	Report (lb/day)	Report (lb/day)	2/week	6-hr. composite

Dibromochloromethane	Report (lb/day)	Report (lb/day)	2/week	6-hr. composite
TRC	---	---	2/week	Grab
Dissolved oxygen	---	5 mg/l	2/week	Grab
Fecal Coliform Colonies	200	400	2/month	Grab

Final Effluent Limitations (effective February 1, 2004)

Effluent Characteristic	Discharge Limitations		Monitoring Requirements	
	Daily Avg.	Daily Max.	Measurement Frequency	Sample Type
Flow	Report	Report	Continuous	Recorder
$CBOD_5$	10 mg/l	15 mg/l	2/week	6-hr. composite
TSS	15 mg/l	23 mg/l	2/week	6-hr. composite
Ammonia-Nitrogen	3 mg/l	6 mg/l	2/week	6-hr. composite
Mercury	0.0007lb/day	0.0017lb/day	2/week	6-hr. composite
Dibromochloromethane	0.127lb/day	0.303lb/day	2/week	6-hr. composite
TRC	---	---	2/week	Grab
Dissolved oxygen	---	5 mg/l	2/week	Grab
Fecal Coliform Colonies	200	400	2/month	Grab

The permit contains a fully approved pretreatment program.
The permit contains biomonitoring.
The permit contains pollution prevention language.

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

Several inspections have been conducted for the City of Westwego as a result of Hurricane Katrina damage. The facility is back to normal operations except for the filter tower. A review of the files indicates the following inspections were performed prior to Hurricane Katrina.
Date – May 12, 2004
Inspector - LDEQ
Findings and/or Violations -

1. The facility was not being operated properly. Clarifiers #3 & #4 were down for service. About 20 nozzles on the activated biofiltration tower were clogged. Excessive foam was flowing over the aeration basin wall.
2. Sampling was not being done correctly. 24-hour composite samples were not collected correctly. TSS samples were collected everyday, but not reported. Fecal coliform results were not reported as geometric mean.
3. Twenty-two permit excursions were reported from July, 2003 to March, 2004.

B) Compliance and/or Administrative Orders

A review of the files indicates the following most recent enforcement actions administered against this facility:

LDEQ Issuance:
Docket # - WE-CN-0681B
Date Issued – December 12, 2005

Findings of Fact:

1. A file review conducted on or around August 25, 2005 revealed numerous violations for fecal coliform and TRC along with several TSS and ammonia-nitrogen exceedences from July, 2002 to October, 2005.

Order:

1. A compliance schedule was put in the Order and the Facility required to meet the following compliance schedule:

Receive approval from LDEQ-SRF	January 31, 2006
Advertise for bids	February 28, 2006
Receive bids	March 31, 2006
Award contract	April 30, 2006
Start construction	May 31, 2006
Completion of project	March 31, 2007

2. The remainder of the original WE-CN-03-0618A was incorporated.

C) DMR Review

A review of the discharge monitoring reports for the period beginning January, 2004 through April, 2006 has revealed the following violations:

Effluent Characteristic	Number of Violations
Ammonia-nitrogen (concentration)	9
TSS - (concentration)	1
Fecal Coliform	5
Dissolved oxygen	2

XII. ADDITIONAL INFORMATION:

Please be aware that the Department will be conducting a TMDL in the Mississippi River Basin scheduled for completion in 2010. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions as a result of the TMDL. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 3 MGD.

Effluent loadings are calculated using the following example:

BOD: 8.34 gal/lb x 3 MGD x 10 mg/l = 250 lb/day

At present, the **Monitoring Requirements, Sample Types, and Frequency of Sampling** as shown in the permit are standard for facilities of flows between 1and 5 MGD.

Mercury Minimization Program

The permittee will be required to develop a Mercury Minimization Plan (MMPP) within one year of permit issuance. This is in response to development of the EPA TMDL for Mercury in Coastal Bays and Gulf Waters. (The City of Westwego is specifically listed in the TMDL.) Studies on municipal wastewater treatment plants (WWTPs) indicate that trace levels of mercury can be present in discharges from these facilities. An important element of the TMDL report is that dischargers within the watershed need to evaluate their potential to discharge mercury in order to demonstrate that a facility is discharging at levels consistent with the TMDL (Below 12 ng/l). Thus, the requirement for the development of a MMPP is included in the permit instead of an effluent limitation. A reopener clause is in the permit to allow for effluent limitations and requirements if needed based on analytical results from sampling required by the MMPP.

The permittee is currently constructing a new outfall location discharging to the Mississippi River. If the new outfall location is complete within 1 year from the date of permit issuance, the requirement to develop a MMPP shall not apply. The Mississippi River was modeled as a single point source in the Mercury TMDL.

Priority Pollutants

Due to the fact that the proposed priority pollutants limit for benzidine is based upon the evaluation of one analyses, the permittee has been given the opportunity to conduct and submit the results of three (3) or more additional effluent analyses to either refute or substantiate the presence of the above toxic pollutant. Prior to finalization of this permit, the additional analyses will be evaluated by this Office to determine if the pollutant is potentially in the effluent and if it potentially exceeds the State's water quality standards.\

Compliance Schedule

Over the life of the permit, the permittee will change outfall locations and be required to meet a water quality based effluent limit for benzidine. In order for the permittee to comply with permit limits required for each outfall location (current and future) and benzidine standards, a compliance schedule is proposed. The permittee shall achieve compliance with the INTERIM AND FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS as specified in accordance with the following schedule:

ACTIVITY	DATE
Achieve Interim I Effluent Limits and Monitoring Requirements	Effective Date of the Permit
Achieve Interim II Effluent Limits and Monitoring Requirements	Upon completion of construction but not later than two years from the effective date of the permit.
Achieve Final Effluent Limitations and Monitoring Requirements	Three years from the effective date of the permit.

The permittee shall submit an annual progress report detailing activities to finish construction and achieve compliance. The permittee shall confirm compliance with final effluent limitations by notifying the Department of Environmental Quality, Office of Environmental Compliance, Permit Compliance Unit in writing within 14 days after the corresponding date in the above compliance schedule.

Pretreatment Requirements

Based upon consultation with LDEQ pretreatment personnel, standard pretreatment language is included in the permit.

STORMWATER PROVISIONS

The requirements of Part II, Section B apply to stormwater discharges associated with industrial activity as defined at LAC 33:IX.2511.B.14.i and Sector T of the LDPES Mult-Sector Stormwater Permit LAR5000. These requirements apply to point source stormwater discharges associated with domestic sewage treatment works with a design flow of 1.0 MGD or more. The City of Westwego, Westwego Wastewater Treatment Facility design capacity is 3 MGD. Therefore, the City of Westwego will also be required to develop a Stormwater Pollution Prevention Plan to be effective six months from the effective date of the permit.

Environmental Impact Questionnaire:

Applicant Comments/Responses (verbatim from applicant)

1. Have the potential and real adverse effects of the proposed facility been avoided to the maximum extent possible?

   The treatment facility remains as is. The discharge location of treated effluent is being relocated from Vic-A-Pitre drainage canal to the Mississippi River via a new force main. The force main routing is not expected to create any adverse environmental impact. The Environmental Information Document (EID) prepared in connection with Revolving Loan Fund (RLF) application from LDEQ is under review by LDEQ currently. Per initial permits received, the project will not create adverse environmental impacts.

2. Does a cost benefit analysis of the environmental impact costs balanced against the social and economic benefits of the proposed facility demonstrate that the latter outweighs the former ?

   The project is not anticipated to create any adverse environmental impacts. However, the force main relocation will eliminate the odor problem faced by residents and businesses near the current discharge location. This social benefit outweighs the non-existent environmental impact.

3. Are there alternative projects which would offer more protection to the environment than the proposed facility without unduly curtailing nonenvironmental benefits?

   Per discussions with LDEQ and per their Consolidated Compliance Order, the new force main as proposed was deemed to offer the most social benefit and protection to the environment.

4. Are there alternative sites which would offer more protection to the environment than the proposed facility site without unduly curtailing nonenvironmental benefits ?

   Per discussions with LDEQ and per their Consolidated Compliance Order, the Mississippi River discharge location as proposed was deemed to offer the most social benefit and protection to the environment.

5. Are there mitigating measures which would offer more protection to the environment than the facility as proposed without unduly curtailing nonenvironmental benefits?

   Per discussions with LDEQ and per their Consolidated Compliance Order, the new force main and discharge location as proposed will offer the most social benefit and protection to the environment.

XIII TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

XIV REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards", Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program", Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, City of Westwego, Westwego Wastewater Treatment Plant, May 19, 2006.